

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

KAREN HENRY, individually and on	)	
behalf of all similarly situated persons,	)	
	)	
Plaintiff,	)	Civil Action No.
v.	)	1:24-cv-00441-TWT
	)	
CLAYTON COUNTY SCHOOL	)	JURY TRIAL DEMANDED
DISTRICT,	)	
	)	
Defendant.	)	

**JOINT MOTION TO STAY DISCOVERY PENDING MEDIATION**

The above-named parties hereby jointly move the Court for a ninety-day stay of all discovery in the case, respectfully showing the Court as follows:

This is a collective action filed under the Fair Labor Standards Act, 29 U.S.C. §§ 201 et seq. (“FLSA”). Plaintiffs are officers with Defendant’s Safety and Security Department. Generally speaking, these Plaintiffs assert that they were not properly compensated for time spent “on call” after hours and on weekends and for meal breaks that were allegedly interrupted because of school emergencies. The Court conditionally certified two collectives, currently containing a total of nineteen (19) plaintiffs, with some persons, including Ms. Henry, in both collectives. [Docs. 3, 7, 38, 44 47-50, 59].

Discovery has been stayed so that the parties could explore settlement. Pursuant to the Court's September 17, 2025 Order [Doc. 73], the discovery stay expired on October 29, 2025. The discovery period is now set to close on December 7, 2025. *Id.*

As set forth in more detail in the parties' previous motion [Doc. 72], since the stay began, the parties have continued informal document production and discussions concerning information available on Plaintiffs' hours worked and wages earned and paid, among other things.

The parties' efforts to explore settlement are ongoing, and to that end the parties have agreed to attempt mediation of this dispute. In light of the coming Winter holidays, the parties have conferred and believe a stay of ninety (90) days is needed to allow sufficient time for the parties to schedule and conduct the mediation, and for additional settlement discussions thereafter as necessary. Should the parties reach a settlement sooner, they will notify the Court promptly.

For the above reasons, the parties jointly and respectfully request that the Court stay discovery in this case for a period of ninety (90) days to continue to allow the parties to focus on a potential settlement. A proposed order is included for the Court's convenience.

Respectfully submitted this 14th day of November 2025.

/s/ William P. Miles Jr.

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 14, 2025, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF filing system which will automatically send e-mail notification of such filing to all counsel of record.

/s/ Jake Knanishu  
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